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OCT 04 2001

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ROBERT C. MECREDDY

Vice President  
Nuclear Operations

September 25, 2001

Ms. Carol Hanlon  
U.S. Department of Energy  
Yucca Mountain Site Characterization Office (M/S #025)  
P.O. Box 30307  
North Las Vegas, Nevada 89036-0307

SUBJECT: Rochester Gas and Electric Comments on the Possible Site Recommendation  
for Yucca Mountain

Dear Ms. Hanlon:

Rochester Gas and Electric Corporation (RG&E), the owner and operator of the R.E. Ginna Nuclear Power Plant located in Ontario, New York, is pleased to submit these comments to the Department of Energy (DOE) on the Possible Site Recommendation for Yucca Mountain (66 FR 43851 - August 21, 2001 and 66 FR 45845 - August 30, 2001).

RG&E endorses the comments submitted by the Nuclear Energy Institute. The nuclear industry, including RG&E, strongly supports a decision to recommend Yucca Mountain for development as a repository for commercial used nuclear fuel and radioactive defense waste. DOE's final suitability determination, informed by public comment, provides an adequate basis and should support a recommendation by the Secretary of Energy to President Bush that Yucca Mountain be developed as a repository site. This would allow the DOE to proceed to the next step in the process - application to the NRC for licenses to build and operate the facility for geologic disposal of commercial used nuclear fuel and radioactive waste from DOE's defense facilities. The NRC review process will independently evaluate the Yucca Mountain site, ensuring public health and safety.

A site recommendation is good energy and environmental policy. A Yucca Mountain site recommendation, based on sound science, is an integral part of an environmentally responsible energy policy. Nuclear energy generation supplies 20 percent of the nation's electricity, and approximately half of the electricity used by RG&E's customers, without emitting greenhouse gases or other harmful air pollutants. Timely progress on safe and scientifically proven geologic disposal of commercial nuclear fuel and nuclear defense waste will ensure that these materials remain isolated from the environment. It is important that today's leaders take action to protect the environment for future generations.

The federal government has a long-standing obligation to manage used nuclear fuel. The Nuclear Waste Policy Act, as amended (the Act), establishes the Federal responsibility for the final disposition of spent nuclear fuel from commercial nuclear power plants, as well as high level radioactive wastes from all users in the United States. The law mandates that consumers of nuclear energy would pay a one mill per kilowatt-hour fee to pay for the federal disposal program. Consumers have committed \$17 billion for this purpose to date, and RG&E's customers have committed in excess of \$60 million of that amount. Still, the federal government has missed the 1998 deadline for beginning to remove used fuel from reactor sites (as specified in the Act and in contracts between the government and owners of nuclear plants, including RG&E). This obligation exists independently of DOE's repository program. Absence of a repository does not obviate the need for the government to meet this obligation. Nevertheless, this determination that 20 years of scientific investigation at Yucca Mountain shows that the site is safe for disposal of used nuclear fuel and defense radioactive waste should strengthen DOE's commitment to meet this obligation. Now, there exists no scientific reason for the federal government to delay the development of a federal repository. Electricity consumers in Rochester, New York, deserve the disposal services for which they have paid. The Secretary of Energy and the President should recommend Yucca Mountain as the site to be developed as a repository.

Very truly yours,



Robert C. Mecredy  
Vice President Nuclear Operations  
Rochester Gas and Electric Corporation